



October 22, 1997

Letter: 97-04-10-108

Mr. Tom Bryant  
Chief Engineer  
Mercy Hospital  
800 W Myrtle  
Independence, Ks. 67301

K.D.H.E.  
OCT 30 1997  
SOUTHEAST DISTRICT OFFICE  
CHANUTE, KANSAS

Dear Mr. Bryant:

IAW Kansas Hazardous Waste Management Standards and Regulations (K.A.R. 28-31-4(g) (4)), the following is submitted for your review and permanent record.

1. Ten files of our current waste streams. Each file is labeled with:
  - a. The proper shipping name of the waste.
  - b. The UN/NA assigned number.
  - c. The emergency response guide number (ERG), per the North American Emergency Response Guidebook.
  - d. The current Material Safety Data Sheet (MSDS) corresponding to each generated waste stream.
    - I. Signs & Symptoms of exposure.
    - II. Effect of acute and chronic overexposure.
    - III. Emergency & First Aid procedures.
    - IV. Medical conditions generally aggravated by exposure.
  - e. The hazardous constituents by chemical or trade name -in parentheses.
  - f. Possible injury notes are on the outside of folders.

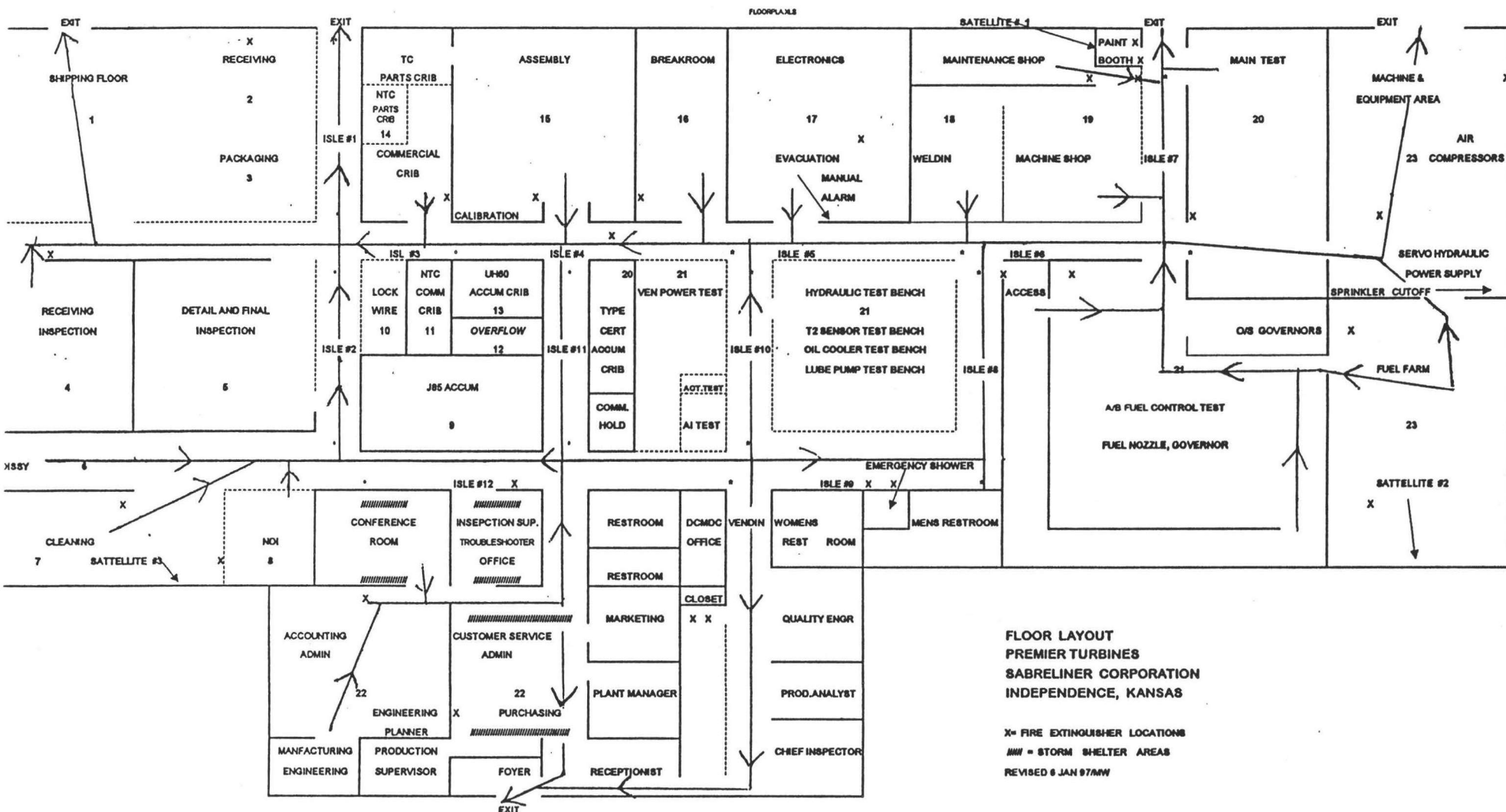
Please feel free to contact me for any questions or additional information.  
Normal work hours 6 am to 4 pm Mon-Thru. Fri 6am to 11 pm.

J.L. Johnson  
Quality Engineer

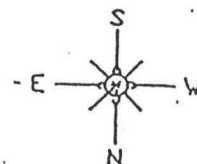


R00170176  
RCRA RECORDS CENTER

Received by: Tom Bryant  
Date: 10-23-97



K.D.H.E.  
OCT 30 1997  
SOUTHEAST DISTRICT OFFICE  
CHANUTE, KANSAS



EVACUATION DIAGRAM  
SABRELINER CORPORATION  
INDEPENDENCE, KANSAS



FIGURE 4

K.D.H.E.

OCT 30 1997

**EMERGENCY ACTION PROCEDURES  
SABRELINER CORPORATION  
INDEPENDENCE, KANSAS  
PAGE 5 OF 5**

*App H.  
INO. Emer*

SOUTHEAST DISTRICT OFFICE  
CHANUTE, KANSAS

**EAP # 5 (EMERGENCY ACTION PROCEDURE FIRE)**

**Upon discovery of a fire by any employee, the following actions shall be taken:**

1. Notify or have another employee notify a Manager/Supervisor.
  - a. Portable extinguishers may be used, if fire is small and can be contained.
- \*\*\*\*NOTE\*\*\*\* Caution must be used if the source of the fire is electrical. Power source should be terminated as soon as possible.
- b. All operations in the general area of the fire shall cease, and the equipment be shut off or placed in a safe condition.
2. If the fire cannot be contained by extinguishers, Supervisor/Manager will appoint a employee to notify the Independence fire Department (911) with:
  - a. Name of company, location and person making call.
  - b. Give specific location (i.e., back west door or front main door) of fire in building.
  - c. Send a employee outside to meet and direct the emergency vehicles.
3. Supervisor/Manager will have the manual alarm activated.
  - a. Electronic siren which is tested and all employees have learned to recognize. .
4. Upon hearing the fire/evacuation alarm, all personnel shall evacuate the plant by the most direct route. Exit routes are posted in all departments and hallways. Prior to leaving each work area, employee's will shut off all equipment and close any pressure valves.
5. The group leaders, prior to exiting the department will insure that all equipment is off and no employee's remain.
6. All employee's upon exiting the facility will assemble across the street beside the water tower for a head count by the group leaders. No employee will leave this area unless directed by supervision.
7. The Master Electric Shut Off can be activated by any employee. (Location is adjacent to the operation/office door & clearly marked).

\*\*\*\*NOTE\*\*\*\* This switch will terminate all electrical power to the facility.

**ONLY EMERGENCY LIGHTING WILL BE AVAILABLE**

# PHILLIPS ENVIRONMENTAL TRAINING INC.

*Certificate of Completion  
presented to*

**J. L. Johnson**

**24-Hour Hazardous Materials Specialist**

**Hazardous Waste Operation and Emergency Response  
29 CFR 1910.120**

*MARCH 23-30, 1995*  
*Date of Instruction*

*Franklin A. Phillips*  
*Franklin A. Phillips  
Certified Environmental Trainer  
Certified Hazardous Materials Instructor*



ENVIRONMENTAL RESOURCE CENTER  
CROWDER COLLEGE

awards this

*Certificate of Training*  
to

**J.L. JOHNSON**

for .8 CEU's or 8.0 Water / 8.0 Wastewater hours in  
**WASTE SITE SUPERVISOR/REFRESHER**  
**29 CFR 1910.120**

DNR # 96-05-401

Course Date: 10/9/96  
Respirator Name & Model:  
Survivair Mark 2 & Drager Pa 80  
Instructor:

*J. Passantino*

Expiration Date: 10/9/97  
Certificate Number: 487-34-4564  
Course Location: ERC-NEOSHO  
Program Director:

*Deion E. Allen*

Training for this program was developed and delivered by the :

Environmental Resource Center, CROWDER COLLEGE

601 LaClede Avenue

Neosho, MO 64850

(417)451-3583

A member of the Community College  
Consortium for Hazardous Materials Training

# Certificate of Completion

*Presented to:*

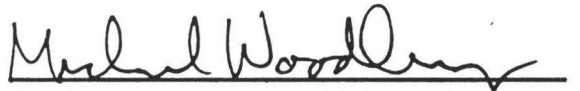
Jim Johnson

K.D.H.E.

OCT 30 1997

SOUTHEAST DISTRICT OFFICE  
CHANUTE, KANSAS

*In recognition of having completed the ERM 40-Hour Integrated Environmental Train-the-Trainer Program designed to meet the training requirements of the OSHA Hazard Communication Standard (29 CFR 1910.1200), RCRA Hazardous Waste Generators Rules (40 CFR 265.16), OSHA Hazardous Waste Operations and Emergency Response Standard (29 CFR 1910.120), DOT HM-126 Awareness Level Training (49 CFR 171-177), Spill Prevention Control and Countermeasures Training (40 CFR 112.7), Occupational Noise Exposure Standard (29 CFR 1910.95), and the Respiratory Protection Standard (29 CFR 1910.134).*

  
Michael Woodbury/David Baron, Instructors

7/15/94  
Date



  
Project Manager



## FACSIMILE COVER PAGE

Date: October 31, 1997

Total Pages: ELEVEN  
(Including Cover Page)

To: VICTORIA O'BRIEN

Company: KDHE CHANUTE, KS.

Telephone No.: (316) 431-2390

Fax No.: (316) 431-1211

From: JIM JOHNSON QA  
Sabreliner Corp.  
Airport Industrial Park  
1 Freedom Drive  
P.O. Box 946  
Independence, KS 67301-0946

Phone: (316) 331-8180  
Fax No.: (316) 331-6426

Message:

### HAZARDOUS WASTE TRAINING PLAN

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL TO WHOM OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW.

If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us by mail. Thank you.

Airport Industrial Park  
1 Freedom Drive  
P.O. Box 946  
Independence, KS 67301-0946



## PERSONNEL TRAINING INDEPENDENCE FACILITY:

**TRAINER: J.L. JOHNSON**  
**QUALITY ENGINEER, ENVIRONMENTAL COORDINATOR.**

**All facility personnel must complete the ORIENTATION and understanding of the below items within six months after the date of their employment.**

**All new employee's must work in supervised positions until they have completed this training.**

**265.16 (a) (3) (I) Procedure for using, inspecting, repairing the facility emergency and monitoring equipment:**

**All portions of the facility are protected by a wet sprinkler system (8 in Viking).  
155 and 165 degree thermal sprinkler heads are located throughout the entire plant.**

**(I) The system is equipped with the following alarms, and is monitored/maintained 24hr/7 day by the Ken Fouts Security, Inc (Central Security).**

- 1. Flow alarm (water to sprinkler heads).**
  - a. Audible in house and to security alarm.**
- 2. Temperature sensors in electronics and garage area.**
  - a. Audible in house and to security alarm.**
- 3. Tamper switch on main water cut off.**
  - a. In house alarm.**
- 4. Three digital pad locations (in plant) for indicating type of alarm and capability to silence alarms with proper codes.**

**System is normally tripped each month to sound alarms (in facility) and to verify connections to monitoring agency.**

**(ii) No waste feed is pumped within this facility. All waste is manually removed from using containers and transferred to 55 gal drums.**

**(iii) Communications: Portable Two-way radios are used between hazmat shed and main facility.**

- (iv) EAP #5 is used for fires or explosions.**
- a. All group leaders shall have hands on training in the use of portable fire extinguishers at least once each year.**
  - b. All tools used shall be spark proof, and all transfer containers of plastic.**



(iv) (continued).

c. All area with flammables are: Class II Type II Explosion Proof electrical.

1. Fuel test area #1.
2. Fuel test area #2.
3. Cleaning/Disassembly area.
4. Maintenance area.
5. Fuel Farm area.

d. No natural gas is supplied to this facility.

(v) N/A All areas of the facility are bermed to contain any spills.

(vi) N/A This facility.

All employee's shall view the film "Working In The Hazard Zone", followed by a discussion on MSDS's with guide and test using a sample MSDS.

The above training will be documented and maintained at the Independence facility.

All facility personnel must take part in an annual review of the initial training that was required

#### WASTE SPILL RESPONSE TRAINING.

The following selected employee's will receive additional-documented training and will be designated as waste spill response personnel.

| EMPLOYEE            | DEPARTMENT            |
|---------------------|-----------------------|
| 1. TOM BROWN        | ASSEMBLY              |
| 2. WILL FORMAN      | CLEANING/DISASSEMBLY  |
| 3. DAVID HARRIS     | CLEANING/DISASSEMBLY  |
| 4. STEVE HUTCHINSON | CLEANING/DISASSEMBLY  |
| 5. DARRELL KING     | MAINTENANCE           |
| 6. ROBERT NELSON    | ASSEMBLY              |
| 7. JIM PETERS       | CLEANING/DISASSEMBLY  |
| 8. MAGGIE RICE      | GROUP LEADER CLEANING |

TRAINER: J.L. JOHNSON

TRAINING REQUIRED:

Time aprx 1 hour.

1. Classroom review of the Spill Response and Notification Procedures (para 5.0 -5.2) Independence Facility Integrated Environmental Response Plan.
2. Location of the facility spill response cart and use of the contents.
3. Use of PPE available in the facility.
4. Disposal of waste material or PPE used during a spill clean up.

**Training (continued)**

5. Notification procedures for waste spills.
6. Review and discussion of the following Emergency Action Procedures:
  - a. EAP #1 (non-routine spill at the hazmat building)
  - b. EAP #2 (non-routine spill at the cleaning area).
  - c. EAP #5 (emergency fire procedures).

**HAZARDOUS WASTE HANDLER  
FIRST RESPONDER (AWARENESS LEVEL)**

DAVID ROGERS (Metrology Lab Technician) \*See job description

TRAINER: J.L. JOHNSON

**TRAINING:**

1. "Working In The Hazard Zone" film (chemical safety, MSDS'S, handling of spills) and use of available PPE.
2. Overview of the Independence Response Plan.
3. Review of the hazardous waste manifest system and land ban documents.
  - a. Items required on manifest.
  - b. Labeling requirements as indicated on manifest.
  - c. Responsibility of checking containers prior to shipping.
    - I. Cleanness (tops of containers).
    - II. All bungs secure and tight.
4. Forklift certification (in house training).
  - a. Film and test.
  - b. Practical driving demonstrations.
  - c. Safety and care of the forklift.

**FIRST RESPONDER OPERATIONS LEVEL**

BRUCE GREEN (Troubleshooter/Supervisor) \* See job description

**ALTERNATE INCIDENT COMMANDER**

TRAINER: J.L. JOHNSON (on site)

**TRAINING:**

1. See training requirements on job description.
2. Have outside certification of 8 hours of Hazardous Waste Operation (Supervisor) and Emergency Response Training.

**TITLE: ENVIRONMENTAL COORDINATOR  
INDEPENDENCE, KS.**

The incumbent will maintain compliance with Local, State and Federal EPA (Environmental) and OSHA (Safety & Health) regulations. The incumbent shall be under the direct supervision of the facility Plant Manager.

**TRAINING:** Completion of 40 Hour HAZWOPER certification.

**OPERATIONS PERFORMED INCLUDE, BUT ARE NOT LIMITED TO:**

1. Manage and maintain the Company's Hazardous Material, Environmental, Safety and Health OSHA programs.
- 2 Develop additional training and inspections programs as regulations and situations require.
3. Perform on-site training for all employee's.
4. Responsible for required inspections of all hazardous areas.
5. Responsible for accumulation, labeling, storage and shipment of hazardous waste.
6. Understand the relevant standard operation procedures and hazard determination procedures.
7. Annual certification of eight hour supervisor training.

**KNOWLEDGE, SKILLS, AND ABILITIES REQUIRED:**

1. Knowledge of local, state and Federal regulations.
2. 40 hour HAZWOPER certification
3. Experience in compliance with State and Federal regulations and reporting.
4. Ability to develop written procedures for Environmental/Safety Programs.
5. Written and oral communication skills as required to implement all programs.



**ALL EMPLOYEE'S**  
**HAZARDOUS WASTE HANDLER**  
**FIRST RESPONDER (AWARENESS LEVEL)**

All new employees are given training (aprx 1 hr) on chemical safety and hazardous waste stored at this facility.

**Training includes:**

1. A 22 minute film "Working In The Hazard Zone", which includes chemical safety, MSDS, handling of spills, and PPE.
2. A written guide to understanding MSDS's, and a discussion of each section
  - a. A written test using the guide and a sample MSDS.
3. A discussion on the chemicals used and waste generated at the facility.
4. Waste handling, storage and responsibility of each employee.
5. Spill control and reporting of any environmental incidents.

Continued OJT training on spill control/reporting and waste handling by group leaders.

---

**EMPLOYEE SIGNATURE**

---

**DATE**





**Group Leader (Cleaning/Disassembly)**

**MAGGIE RICE  
HAZARDOUS WASTE HANDLER  
FIRST RESPONDER (AWARENESS LEVEL)**

**Performs and logs bi-weekly inspection of the hazmat storage shed for:**

- 1. Condition of floor, containers, container tops & general condition of shed.**
- 2. Responsible for changing chemicals each week.**
  - a. Directs team members on waste handling.**
  - b. Instructs any new employees after initial hazmat orientation.**
  - c. Checks waste drum containers for labeling secured bungs.**
- 3. Initial training (1 hr) on chemical safety, & MSDS interpretation.**
- 4. Orientation on any new chemicals or waste stream generated.**

**The employee reports directly to the Production Manager, and to the Quality Engineer relating to any waste chemicals or waste streams.**

**Continued OJT training on spill control/reporting and waste handling .**

---

**EMPLOYEE SIGNATURE**

---

**DATE**



**Metrology Lab Technician**

**DAVID ROGERS  
HAZARDOUS WASTE HANDLER  
FIRST RESPONDER (AWARENESS LEVEL)**

**Performs and logs weekly inspection of the hazmat storage shed and the petroleum storage area. Checks labeling and containers in the 90 day storage area. Operates forklift and loads waste shipments per manifest.**

**Checks all areas of plant for any leakage during his normal calibration duties.**

**Communications skills (written/verbal) are imperative for briefing the Quality Engineer on various topics related to the facilities environmental protection.**

**Initial training (min 1 hr) on chemical safety, MSDS interpretation.**

**Forklift check out or training before operating the forklift.**

**Continued OJT training on spill control/reporting during the first 6 months of starting on the job.**

**For all Hazmat duties, the employee reports to and is under the direct supervision of the Quality Engineer.**

\_\_\_\_\_  
**EMPLOYEE SIGNATURE**

\_\_\_\_\_  
**DATE**



**BRUCE GREEN**  
**TROUBLESHOOTER/SUPERVISOR**  
**FIRST RESPONDER OPERATIONS LEVEL**  
**ALTERNATE INCIDENT COMMANDER**

**Certified as having completed eight hours of Hazardous Waste Operation (Supervisor) and Emergency Response Training.**

- 1. Know the basic hazard and risk assessment techniques.**
- 2. Know how to select and use the proper PPE provided to the First Responder.**
- 3. Understand basic hazardous materials terminology.**
- 4. Know how to perform basic control, containment, and/or confinement operations with the capabilities of the resources and PPE available to them.**
- 5. Know how to implement basic decontamination procedures.**
- 6. Understand the relevant standard operation procedures and hazard determination procedures.**
- 7. Annual certification of eight hour training.**

---

**EMPLOYEE SIGNATURE**

---

**DATE**



**JIM L. JOHNSON  
QUALITY ENGINEER  
FIRST RESPONDER OPERATIONS LEVEL  
INCIDENT COMMANDER**

**Certified as having completed 24 hours of HAZWOPER training equal to the First Responder Operations Level plus additional competency in the following areas:**

- 1. Know and be able to implement the Incident Command System.**
- 2. Understand how to implement the Integrated Emergency Response Plan.**
- 3. Know and understand the hazards and risks associated with employees working in PPE.**
- 4. Know how to implement the emergency response plan.**
- 5. Know how to implement basic decontamination procedures.**
- 6. Understand the relevant standard operation procedures and hazard determination procedures.**
- 7. Annual certification of eight hour training.**

---

**EMPLOYEE SIGNATURE**

---

**DATE**